



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 9, 2020

BY ECF

Honorable Gregory H. Woods
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Edward Shin,
19 Cr. 552 (GHW)

Dear Judge Woods:

The Government and the defendant Edward Shin jointly and respectfully submit this letter to request an adjournment of the deadline for filing pretrial materials required by Rule 6 of the Court's Individual Rules of Practice in Criminal Cases, including motions *in limine*, currently scheduled for November 12, 2020. This is the first such request by the parties. As the Court is aware, trial in the above-captioned matter is tentatively scheduled to begin February 22, 2021, with a backup date of March 15, 2021, contingent upon confirmation by the District Court Trial Scheduling Committee. It is the parties understanding that the Scheduling Committee will be announcing which trials are confirmed to take place in the first quarter of 2021 sometime in late November or early December.

Accordingly, the parties jointly propose setting a schedule for the filing of all pretrial materials required by Rule 6 of the Court's Individual Rules, including motions *in limine*, once a trial date has been confirmed. This approach would allow the Court to set a motions schedule, taking into account 3500 and trial exhibit deadlines, such that the parties would be able to identify and resolve more issues prior to trial. Moreover, the defense has made several discovery-related requests to which the Government is in the process of responding. Adjourning the deadline for motions *in limine* would also permit the Government to respond to those requests, hopefully narrowing or eliminating some of the issues that may need to be resolved by the Court later.

Respectfully submitted,

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